

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

UNITED STATES OF AMERICA §
 § No. 5:22-CR-
v. §
 §
AARON STEPHENS §
 §

INDICTMENT

THE GRAND JURY CHARGES

COUNT ONE

Conspiracy to Restrain Trade:
15 U.S.C. § 1 (Bid Rigging)

1. Beginning at least in and around May 2013 and continuing through at least in and around April 2018, in the Eastern District of Texas and elsewhere, AARON STEPHENS, together with COCONSPIRATOR 1, and others, both known and unknown to the grand jury, entered into and engaged in a continuing combination and conspiracy to suppress and eliminate competition by rigging bids for government contracts performed for the United States Army, including at the Red River Army Depot ("RRAD") in Texarkana, Texas. The combination and conspiracy engaged in by AARON STEPHENS was a per se unlawful, and thus unreasonable, restraint of interstate trade and commerce in violation of Section 1 of the Sherman Act (15 U.S.C. §1).

2. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among AARON STEPHENS, COCONSPIRATOR 1, and others, both known and unknown to the grand jury, the substantial terms of which were to rig bids for contracts providing operation and maintenance support services to agencies and organizations within and/or subject to the control of the United States Army.

3. A purpose and effect of this combination and conspiracy was to rig bids and give the false impression of competition in order to obtain and secure government contracts and receive payment thereof.

RELEVANT BUSINESS ENTITIES

At times relevant to this Indictment:

4. BUSINESS ENTITY 1 was a Limited Liability Company ("LLC") organized and existing under the laws of Texas and was owned, controlled, and operated by COCONSPIRATOR 1. BUSINESS ENTITY 1 was involved in, among other things, the production, recreation, and sale of specialized vehicle parts and components.

5. HP LOGIT was an LLC organized and existing under the laws of Texas. HP LOGIT was involved in, among other things, contracting work and vehicle refurbishment. At times, AARON STEPHENS partially owned, operated, and controlled HP LOGIT.

6. WHITE'S PAINT BLAST was an LLC organized and existing

under the laws of Texas. WHITE'S PAINT BLAST was involved in, among other things, contracting work and vehicle refurbishment. At times, AARON STEPHENS partially owned, operated, and controlled WHITE'S PAINT BLAST.

7. BUSINESS ENTITY 4 was a corporation organized and existing under the laws of Delaware with a principle place of business in Milwaukee, Wisconsin. BUSINESS ENTITY 4 was involved in, among other things, the sale of specialized vehicle parts and components.

8. BUSINESS ENTITY 5 was an LLC organized and existing under the laws of Texas. BUSINESS ENTITY 5 was involved in, among other things, government contracting.

9. BUSINESS ENTITY 6 (sometimes doing business under an alias) was an LLC organized and existing under the laws of Texas. BUSINESS ENTITY 6 was involved in, among other things, janitorial services and government contracting.

METHOD AND MEANS OF CONSPIRACY

10. For the purpose of forming and carrying out the charged combination and conspiracy, AARON STEPHENS, COCONSPIRATOR 1, and others, both known and unknown to the grand jury, did those things that they combined and conspired to do, including, among other things:

- a. Exchanged pricing information and bid proposals with each other for the purposes of submitting complementary (that is, intentionally losing) and rigged bid proposals for contracting services for the United States government, and specifically, the United States Army.
- b. Requested from, and agreed to provide to, each other complementary and rigged bid proposals for contracting services for the United States government, and specifically, the United States Army.
- c. Caused the submission, and directed to cause the submission, of rigged bids for contracting work for the United States government.
- d. Accepted payments from or derived from the United States government for contracting work obtained by, through, and with the aid of the combination and conspiracy.

OVERT ACTS

Bid 1

11. In or about May 2013, the RRAD issued a solicitation for contract number W911RQ-13-D-0016, for the refurbishment of add-on armor kits for Heavy Expanded Mobility Tactical Truck (HEMTT) vehicles and certain related work. COCONSPIRATOR 1 submitted a complementary bid

on behalf of BUSINESS ENTITY 5 for a total of approximately \$12.425 million.

12. Prior to submitting BUSINESS ENTITY 5's bid described in Par. 11, COCONSPIRATOR 1 coordinated with AARON STEPHENS to ensure that COCONSPIRATOR 1's bid would be higher than a bid placed by AARON STEPHENS for the firm HP LOGIT. The winning bid placed by AARON STEPHENS was for a total of approximately \$10.2 million. HP LOGIT was paid a total of approximately \$6,546,422.25. HP LOGIT received payments for this contract from the government up to and through on or about January 18, 2018.

Bid 2

13. In or around January 2014, COCONSPIRATOR 1 sought to obtain work from the RRAD to furnish certain wire harnesses. In order to obtain this contract, COCONSPIRATOR 1 coordinated by email on January 27, 2014 with AARON STEPHENS in order to obtain a complementary bid. COCONSPIRATOR 1 sent AARON STEPHENS the below e-mail.

----- Forwarded message -----
From: Coconspirator 1
Date: Monday, January 27, 2014
Subject: Need a second quote
To: Aaron <piatzmanager@msn.com>

Aaron,

Would you please send the attached quote to [REDACTED] I need a competitive bid from you so I can close this deal on a few wiring harnesses. His email is below and your quote attached. Please put it on letter head and send him a new email with it attached

[REDACTED]
Thank you sir

Coconspirator 1

14. COCONSPIRATOR 1 attached to his January 27, 2014, e-mail a quote prepared by COCONSPIRATOR 1 for AARON STEPHENS to submit, including pricing of approximately \$4,140. COCONSPIRATOR 1 placed a bid of approximately \$3,000 on behalf of BUSINESS ENTITY 1.

15. On or about January 28, 2014, AARON STEPHENS submitted the prepared bid of \$4,140 via e-mail to a government employee. On or about the same day, AARON STEPHENS forwarded that e-mail to COCONSPIRATOR 1, confirming that he had submitted the bid as requested.

Bid 3

16. On or about May 1, 2014, the RRAD issued a solicitation for contract number W911RQ-14-P-0068, for the inspection, inventory,

refurbishment, and packaging standards of doors for military vehicles known as Family of Medium Tactical Vehicles (FMTVs), as well as related work.

17. AARON STEPHENS requested that COCONSPIRATOR 1 submit a complementary bid. On or about June 16, 2014, sent an e-mail directing COCONSPIRATOR 1 to submit a bid at a given price per unit.

Aaron Stephens <piatxmanager@msn.com>
6/16/2014 9:39:38 PM

Fwd: removal of B armor (UNCLASSIFIED)

Need you to price this at \$1050 each

Sent from my iPhone

Begin forwarded message:

18. As requested by AARON STEPHENS, COCONSPIRATOR 1 submitted a complementary bid on behalf of BUSINESS ENTITY 5.

19. AARON STEPHENS placed a bid on behalf of HP LOGIT for approximately \$950 per unit, \$100 less per unit than what AARON STEPHENS requested that COCONSPIRATOR 1 bid. HP LOGIT, by and through AARON STEPHENS, was awarded the contract, and received a total of approximately \$10,300.66 in payments with the last payment being received on or about September 9, 2015.

Bid 4

20. On or about June 4, 2014, a government employee at the RRAD e-mailed AARON STEPHENS, COCONSPIRATOR 1, and others regarding an urgent need for the government to test, repair, and ship Battery Powered Motorized Traversing Units (BPMTUS). This solicitation eventually became contract number W911RQ-14-C-0014. The contract involved delivering materials to the Sierra Army Depot, located in Herlong, California. The below is an excerpt of that e-mail.

Classification: UNCLASSIFIED
Caveats: FOUO

RRAD has an urgent requirement to Test, Repair, and Ship Battery Powered Motorized Traversing Unit (BPMTU) Controller Box, Joystick, Motor Drive Assembly and Electrical components. Delivery will be 50 kits delivered to SIAD by August 29, 2014 and 100 kits delivered to SIAD by September 30, 2014. All BPMTU's are located at SIAD and will need to be picked up and returned to SIAD. All work must be done within 100 miles of RRAD and inspections will take place at contractors facility.

You will find the following documents attached: Specific Packaging Requirement, Reporting Spreadsheet, and complete SOW.

If you are interested in quoting on this requirement, please respond via email by Tuesday, June 10th at 8am CST.

If you have any questions please let me know.

V/R

21. On or about June 9, 2014, AARON STEPHENS sent e-mails to the government official regarding the solicitation described in Par. 20. AARON STEPHENS's e-mails included a bid proposal with pricing

figures for a bid on behalf of HP LOGIT. An excerpt of one e-mail is below.

```
>> For a Red River Pick up and Sierra Army Depot delivery it will be $1,148.52 each X 150
kits for a total Of $172,278.15
>>
>> For a pick up from Sierra Army Depot and delivery back it will be $1,252.93 each X 150
kits for a total of $187,939.80
>>
>>
>> Any questions please let me know.
>>
>> V/R
>>
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22. On that same day, AARON STEPHENS e-mailed COCONSPIRATOR 1 the pricing used in AARON STEPHENS's bid on behalf of HP LOGIT. In the e-mail, AARON STEPHENS forwarded the pricing information that had been prepared by a business associate of AARON STEPHENS.

Aaron Stephens <piatxmanager@msn.com>
6/9/2014 6:50:42 PM

Fwd: HUMVEE Turret Pricing

Sent from my iPhone

Begin forwarded message:

From: [REDACTED]
Date: June 9, 2014 at 1:19:54 PM CDT
To: <piatxmanager@msn.com>
Subject: HUMVEE Turret Pricing

Pricing for qty 150 kits,

Pick up parts from RRAD and deliver to Sierra:	\$172,278.15
Pick up parts from Sierra Army Depot and deliver to Sierra:	\$187,939.80

23. Using the bid pricing provided by AARON STEPHENS, on or about June 9, 2014, COCONSPIRATOR 1 supplied a complementary bid, on behalf of BUSINESS ENTITY 4, which COCONSPIRATOR 1 priced a few thousand dollars above AARON STEPHENS'S bid. An excerpt of COCONSPIRATOR 1's e-mailed bid is below.

Thanks for the opportunity. **Business Entity 4** proposes the following pricing for 150 units.

Pick up at Red River Army Depot & return completed units to Sierra Army Depot.

1167.72 per unit. Total 150 units 175,158.00

Pick up at Sierra Army Depot & return completed units to Sierra Army Depot.

1273.14 per unit. Total 150 units 190974.00

Thanks

Coconspirator 1

24. On or about June 23, 2014, HP LOGIT was awarded contract W911RQ-14-C-0014 for the amount of approximately \$187,939.50. HP LOGIT received approximately \$187,939.50, receiving a final payment of approximately \$62,646.50 on or about October 31, 2014.

Bid 5

25. On or about June 18, 2014, the solicitation was released by RRAD for contract W911RQ-14-0028 for the testing and repair of BPMTUS. On or about June 24, 2014, AARON STEPHENS, COCONSPIRATOR 1, and another person filed certification of formation paperwork for an LLC with the Texas Secretary of State for the firm TEXARKANA PARTS AND

LOGISTICS. In doing so, they became business partners in that company, and owned, operated and controlled it. Nonetheless, AARON STEPHENS and COCONSPIRATOR 1 continued to submit bids against each other on behalf of different firms.

26. On or about July 8, 2014, a modification was made to the solicitation, which required bidding companies to give additional line-item details about their bids.

27. On or about July 17, 2014, AARON STEPHENS sent COCONSPIRATOR 1 an e-mail, in which AARON STEPHENS asked COCONSPIRATOR 1 to "take the forward off" and send the e-mail to the contracting official. That e-mail included, as an attachment, complete pricing information to use in order for COCONSPIRATOR 1 to place a bid on the contract, with the shipping price per unit detailed as a separate line item, as required by the July 8, 2014 modification. An excerpt of that e-mail, along with excerpts of the attendant attachment, is below.

Aaron Stephens <aaronssg@outlook.com>

7/17/2014 5:02:11 PM

Fwd: Attached Image

If you get this please take the forward off of it and send it to [REDACTED] If I do t hear from you I will have [REDACTED] send it for you.

[REDACTED] changed and wanted the shipping broken out. So this is corrected.

Thanks

Sent from my iPhone

Begin forwarded message:

ITEM NO	SUPPLIES/SERVICES	ESTIMATED QUANTITY	UNIT	UNIT PRICE	ESTIMATED AMOUNT
0001	Test, Repair and shipping of BPMTU FFP Test, Repair and shipping of Program Battery Powered Motorized Traversing Unit (BPMTU) Controller Box, Joystick, Motor Drive Assembly and Electrical components.	2,394	Each	\$1,165.-	
FOB: Destination PURCHASE REQUEST NUMBER: A5123001280099					

ESTIMATED
NET AMT

\$2,789,010.-

ITEM NO	SUPPLIES/SERVICES	ESTIMATED QUANTITY	UNIT	UNIT PRICE	ESTIMATED AMOUNT
0003	BPMTU SHIPPING FFP Shipping of complete BPMTU Kits to SIAD according to schedule outline in each DO. Shipping will take place each quarter. FOB: Destination PURCHASE REQUEST NUMBER: A5123001280097	2,394	Each	\$85.-	

ESTIMATED
NET AMT

\$203,490.-

28. COCONSPIRATOR 1 did as AARON STEPHENS asked and submitted this complementary bid to the contracting official on behalf of BUSINESS ENTITY 5. In turn, AARON STEPHENS submitted a bid on behalf of HP LOGIT for a total of approximately \$2,750,706.00, including shipping. HP LOGIT received a total of approximately \$2,896,956.00, with the last payment being made on or about January 6, 2016.

Bid 6

29. In or around July 2014, the RRAD released a solicitation for contract W911RQ-14-D-0029 for the complete rebuild of M915 and M917 military vehicle cabs and related work. AARON STEPHENS coordinated with COCONSPIRATOR 1 to submit complementary bids through other companies to create the false impression of actual competition.

30. On or about August 11, 2014, AARON STEPHENS submitted a complementary bid on behalf of HP LOGIT for a total of approximately \$5,305,250.

31. On or about August 17, 2014, COCONSPIRATOR 1 submitted a bid on behalf of BUSINESS ENTITY 4 for approximately \$4,970,000.

32. On or about September 24, 2014, COCONSPIRATOR 1 was notified, via e-mail, that BUSINESS ENTITY 4 had received the contract and was asked to sign the award paperwork. BUSINESS ENTITY 4 received a total of approximately \$7,616,495.60 for its work on this contract with payments received through on or about June 16, 2017.

Bid 7

33. In or around January 2017, the government was receiving bid proposals for contract W56HZV-17-D-0034 for the refurbishment of Reusable Metal Containers that the Army needed to store and ship

equipment, including military vehicle parts and engines.

34. AARON STEPHENS, through HP LOGIT, and COCONSPIRATOR 1, through BUSINESS ENTITY 5, coordinated the exchange of pricing information by and through subordinates: PERSON 1 and PERSON 2. COCONSPIRATOR 1 directed PERSON 1 to compile BUSINESS ENTITY 5's bid, share bidding information with PERSON 2 for HP LOGIT's use, and to submit BUSINESS ENTITY 5's bid. On or about January 17, 2017, PERSON 2 shared HP LOGIT's bidding information with PERSON 1, via e-mail.

To	Person 1
From	Person 2
Date/Time - UTC+00:00 (M/d/yyyy)	1/17/2017 3:58:19 PM
Subject	HPLogIT Bid
Body	Good morning! Attached is HP's bid. Thanks, Person 2 HPLogIT Management, LLC

35. On or about January 23, 2017 and on or about January 25, 2017, COCONSPIRATOR 1 and PERSON 1 exchanged an e-mail related to BUSINESS ENTITY 1 and an e-mail the bid that PERSON 1 ultimately submitted on behalf of BUSINESS ENTITY 5.

36. On or about January 25, 2017, PERSON 1 sent PERSON 2 an e-mail, which read in part "Can you please resend the container bid that [COCONSPIRATOR 1] had you send to me before?"

1/25/2017 4:53:34 PM

container quote

Hi Person 2 Can you please resend the container bid that COCON 1 had you send to me before? I can't seem to find mine and I need to put it on a different spreadsheet for the gov't. Thanks, Person 1
Business Entity 1

37. After coordination and exchanging information, including through the e-mails described in Pars. 35-38, BUSINESS ENTITY 5 submitted a bid to the government of approximately \$877,200 and HP LOGIT submitted a complementary bid of approximately \$902,955. BUSINESS ENTITY 5 was awarded the contract, and ultimately received a total of approximately \$479,500 worth of payments, with the last payment being received on or about April 30, 2018.

TRADE AND COMMERCE

38. During the period covered by this Indictment, AARON STEPHENS and his coconspirators' business activities in connection with the performance of government contracts obtained during and in relation to the conspiracy were within the flow of, and substantially affected, interstate trade and commerce. AARON STEPHENS and his coconspirators used the internet, interstate highways, and other instrumentalities of interstate

commerce to effectuate their conspiracy. AARON STEPHENS and his coconspirators purchased, or caused to be purchased, and shipped, or caused to be shipped, goods that traveled in and substantially affected interstate trade and commerce.

ALL IN VIOLATION OF TITLE 15, UNITED STATES CODE,
SECTION 1.

COUNT TWO
Conspiracy to Defraud the United States
18 U.S.C. § 371:

39. Paragraphs 4 through 38 are realleged and incorporated by reference as if they were fully set forth herein.

40. Beginning at least in and around May 2013 and continuing through at least in and around April 2018, in the Eastern District of Texas and elsewhere, AARON STEPHENS, together with COCONSPIRATOR 1, and others, both known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate and agree to defraud the United States and agencies thereof, to wit, the United States Army, to impair, obstruct, and defeat by dishonest means and misrepresentation the lawful function of the United States Army's purchasing of goods and services through a competitive bidding process in violation of 18 U.S.C. § 371.

41. The charged combination and conspiracy consisted of a

continuing agreement, understanding, and concert of action among AARON STEPHENS, COCONSPIRATOR 1, and others, both known and unknown to the grand jury, the substantial terms of which were to submit fraudulent and rigged bids for contracts providing operation and maintenance support services to agencies and organizations within and/or subject to the control of the United States Army.

42. The object of the conspiracy was for AARON STEPHENS, COCONSPIRATOR 1, and others, to interfere and obstruct the United States Army's purchasing of goods and services through a competitive bidding process, as specified by law. The purpose and effect of this combination and conspiracy was to submit fraudulent and rigged bids and give the false impression of competition in order to obtain and secure government contracts and receive payment thereof.

ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE,
SECTION 371.

COUNT THREE

Conspiracy to Defraud the United States
18 U.S.C. § 371:

43. Paragraph 9 is realleged and incorporated by reference as if it were fully set forth herein.

44. Beginning at least on or around June 10, 2019, and continuing through at least on or around June 25, 2020, in the Eastern

District of Texas and elsewhere, AARON STEPHENS, together with COCONSPIRATOR 2, and others, both known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate and agree to defraud the United States and agencies thereof, to wit, the United States Army, to impair, obstruct, and defeat by dishonest means and misrepresentation the lawful function of the United States Army's purchasing of goods and services through a competitive bidding process in violation of 18 U.S.C. § 371.

45. The charged combination and conspiracy consisted of a continuing agreement, understanding, and concert of action among AARON STEPHENS, COCONSPIRATOR 2, and others, both known and unknown to the grand jury, the substantial terms of which were to submit fraudulent and rigged bids for a contract to provide construction work related to a natural gas distribution system for agencies and organizations within and/or subject to the control of the United States Army.

46. The object of the conspiracy was for AARON STEPHENS, COCONSPIRATOR 2, and others, to interfere and obstruct the United States Army's purchasing of services through a competitive bidding process, as specified by law. The purpose and effect of this combination and conspiracy was to submit rigged bids and give the false impression of competition in order to obtain and secure a government contract and receive payment

thereof.

RELEVANT BUSINESS ENTITIES

At times relevant to this Indictment:

47. BUSINESS ENTITY 8 was a corporation organized and existing under the laws of California. BUSINESS ENTITY 8 was involved in, among other things, construction and contracting work.

48. STEPHENS SERVICES GROUP was an LLC organized and existing under the laws of Texas, with a registered address in Texarkana, Texas, and was owned, controlled, and operated by AARON STEPHENS and COCONSPIRATOR 2. AARON STEPHENS owned a 51% share of the entity and COCONSPIRATOR 2 owned a 49% share. STEPHENS SERVICES GROUP was involved in, among other things, construction and contracting work.

METHOD AND MEANS OF CONSPIRACY

49. For the purpose of forming and carrying out the charged combination and conspiracy, AARON STEPHENS, COCONSPIRATOR 2, and others, both known and unknown to the grand jury, did those things that they combined and conspired to do, including, among other things:

- a. Determined and agreed to provide, for their own benefit, complementary and rigged bid proposals for contracting

services for the United States government, and specifically, the United States Army.

- b. Exchanged pricing information and bid proposals with each other for the purposes of submitting complementary and rigged bid proposals for contracting services for the United States government, and specifically, the United States Army.
- c. Caused the submission, and directed to cause the submission, of rigged bids for contracting work for the United States government.
- d. Accepted payments from or derived from the United States government for contracting work obtained by, through, and with the aid of the combination and conspiracy.

OVERT ACTS

Bid 8

50. On or about June 6, 2019, a solicitation was released for work needed to replace a natural gas pipeline at the Pine Bluff Arsenal in Arkansas. This solicitation would become contract W911RP-19-C-0002 for the replacement of a natural gas distribution system at the Pine Bluff Arsenal in Arkansas (the "gas line project").

51. On or about June 10, 2019, AARON STEPHENS and

COCONSPIRATOR 2 had determined that they would assist BUSINESS ENTITY 8 in obtaining a contract for the gas line project. AARON STEPHENS and COCONSPIRATOR 2 determined to do this so that their company, STEPHENS SERVICES GROUP, could perform subcontracting work for BUSINESS ENTITY 8 and receive financial benefit therefrom.

52. On or about June 10, 2019, COCONSPIRATOR 2 sent an e-mail to PERSON 3, which included attached materials related to the preparation of a bid for the gas line project. AARON STEPHENS was carbon copied on the e-mail.

From: Coconspirator 2
Sent: Monday, June 10, 2019 12:15 PM
To: [REDACTED]
Cc: aaronssg@outlook.com
Subject: PBA Project

[REDACTED]

I have attached the documents for the gas line distribution system project at Pine Bluff Arsenal. If you will take a look at pages 6-9 of the solicitation, we need to get together and figure out what we want to include in our first proposal. Thank you sir.

V/R

Coconspirator 2
SSG

53. On or about June 19, 2019 AARON STEPHENS and COCONSPIRATOR 2 both attended a site visit at the Pine Bluff Arsenal related to the gas line project. COCONSPIRATOR 2 wrote his name, phone number, and e-mail on a sign in sheet and listed his affiliated company as

"BUSINESS ENTITY 8". AARON STEPHENS filled out the same sign in sheet, listing his affiliated company as the known alias for BUSINESS ENTITY 6.

54. On or about July 8, 2019, AARON STEPHENS submitted, through e-mail, a step one proposal on behalf of BUSINESS ENTITY 6 for the gas line project. A portion of that e-mail is included below.

From: Aaron Stephens <aaronssg@outlook.com>
Sent: Monday, July 8, 2019 2:57 PM
To: [REDACTED]
Cc: Aaron Stephens
Subject: [Non-DoD Source] Business Entity 6 Step One Proposal for W911RP19R0004
Attachments: BE 6 Proposal.pdf, BE 6 SF 1442.pdf

Good afternoon,

Attached is [REDACTED]'s Step One proposal for the Natural Gas Distribution System project at PBA. The SF 1442 is attached separately. If you have any questions, please let me know. Thank you.

V/R

Aaron Stephens

Construction Manager

Business Entity 6 [REDACTED]

55. On or about July 9, 2019, COCONSPIRATOR 2 submitted through e-mail, a step one proposal on behalf of BUSINESS ENTITY 8 for the gas line project. A portion of that e-mail is included below.

From: Coconspirator 2 <[REDACTED]@outlook.com>
Sent: Tuesday, July 9, 2019 10:49 AM
To: [REDACTED]
Cc: Coconspirator 2
Subject: [Non-DoD Source] W911RP-19-R-0004 Business Entity 8 Step One Proposal
Attachments: Business Entity 8 Step One Proposal.pdf

Good morning,

Attached is the Step One proposal for Business Entity 8. If you have any questions or need any additional documentation, please let me know. Thank you for your time.

V/R

Coconspirator 2

56. The proposals submitted by AARON STEPHENS and COCONSPIRATOR 2 were, in part, substantially similar, including certain portions of text that were identical.

57. On or about August 6, 2019, BUSINESS ENTITY 8 submitted a bid to perform the work for the gas line project of approximately \$5,999,707.

58. On or about August 7, 2019, AARON STEPHENS, on behalf of BUSINESS ENTITY 6, submitted a complementary bid to perform work for the gas line project of approximately \$6,090,536.00. AARON STEPHENS wrote and signed his name for the submission, and identified himself as a "Construction Manager" for BUSINESS ENTITY 6.

59. On or about August 19, 2019, BUSINESS ENTITY 8 was awarded contract W911RP-19-C-0002.

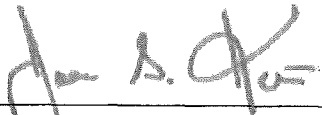
60. BUSINESS ENTITY 8 received a total of \$5,677,324.08 with final payment received on or about June 25, 2020.

ALL IN VIOLATION OF TITLE 18, UNITED STATES CODE,
SECTION 371.

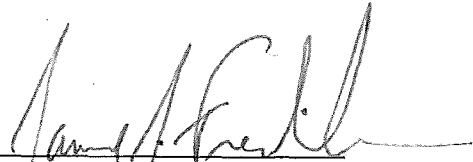
A TRUE BILL:

5/18/2022
DATE

[Signature]
GRAND JURY FOREPERSON



JONATHAN S. KANTER
Assistant Attorney General



JAMES J. FREDRICKS
Chief, Washington Criminal II
Office



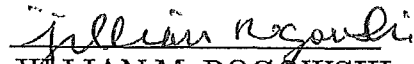
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